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EXPERIAN INFORMATION SOLUTIONS, INC.
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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION
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12 ROANE HOLMAN, and all others similarly
situated,

13 Plaintiffs,
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15 v.

16 EXPERIAN INFORMATION SOLUTIONS,
INC.; FINEX GROUP LLC,

17 Defendants.
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Case No. CV-11-00180-CW (DMR)

Assigned to Magistrate Judge Donna M.
Ryu for Discovery

**JOINT REQUEST FOR ORDER
EXTENDING EXPERIAN'S
DEADLINE TO RESPOND TO
DISCOVERY**

AND

[~~PROPOSED~~] ORDER

1 Defendant Experian Information Solutions, Inc. (“Experian”) and Plaintiffs Roane
2 Holman, Narcisco Navarro Hernandez, and Miguel A. Alvarez (“Plaintiffs” and, together with
3 Experian, the “Parties”) submit this Joint Request for Order Extending Experian’s Deadline to
4 Respond to Discovery.

5 WHEREAS, on June 14, 2012, Magistrate Judge Donna M. Ryu held a hearing on
6 Plaintiffs’ motion to compel responses to Plaintiffs’ second set of requests for admissions and
7 fourth set of interrogatories directed to Experian and, as confirmed in her written order dated June
8 27, 2012, “the parties were ordered to complete the subject discovery within 90 days of the
9 hearing”—i.e., by September 12, 2012—“and were instructed to meet and confer if any further
10 extension of time became necessary.” *See* Docket 154, 160.

11 WHEREAS, Plaintiffs’ second set of requests for admissions and fourth set of
12 interrogatories seek discovery related to whether each of 36,387 putative class members asked to
13 have their vehicles towed or had their towing charges judicially established.

14 WHEREAS, the parties have not completed their discovery of Finex’s documents and
15 their review of that information.

16 WHEREAS, the Parties agree that it would be premature for Experian to attempt to
17 respond to Plaintiffs’ second set of requests for admissions and fourth set of interrogatories and
18 that Experian will need at least two more months to respond to that discovery.

19 NOW, THEREFORE, the Parties request the Court to extend Experian’s deadline to
20 respond to that discovery for sixty days, up to and including November 13, 2012. The Parties
21 will continue to meet and confer regarding additional extensions.

1 Dated: August 16, 2012

JONES DAY

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3 By: /s/ Michael G. Morgan

4 Michael G. Morgan

5 Attorneys for Defendant
6 EXPERIAN INFORMATION SOLUTIONS,
7 INC.

8
9 Dated: August 16, 2012

ANDERSON OGILVIE & BREWER LLP

10 By: /s/ Andrew J. Ogilvie

11 Andrew J. Ogilvie

12 Attorneys for Plaintiff
13 ROANE HOLMAN, NARCISCO
14 NAVARRO HERNANDEZ, MIGUEL A.
15 ALVAREZ and all others similarly situated
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PROPOSED ORDER

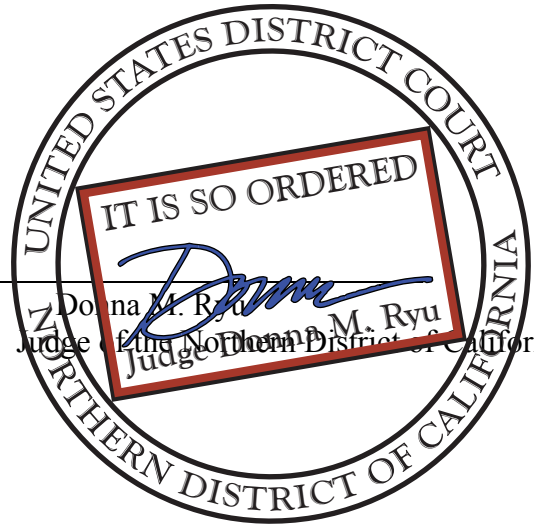
Pursuant to the Parties' request and good cause appearing, the Court orders as follows:

1. Experian's deadline to respond to the Plaintiffs' fourth set of interrogatories and second set of requests for admissions is hereby extended for sixty days, up to and including November 13, 2012.
2. The Parties are directed to meet and confer regarding additional extensions of the deadline.

IT IS SO ORDERED.

Dated: August 17, 2012

Donna M. Ryu
Magistrate Judge of the Northern District of California



LAI-3174141v1